



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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July 1, 2014

By ECF

Hon. Vera M. Scanlon
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ramooe, Inc. v. City of New York et al.;
13 CV 01045

Your Honor:

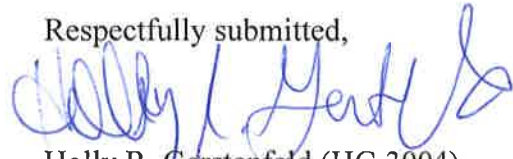
I write in accordance with your request for a summary of the litigation that is currently pending in state court relating to the Broadway Triangle project. The case name and index number are as follows: Broadway Triangle Community Coalition v. Bloomberg et al., New York County Index No. 112799/09.

The properties involved in the Broadway Triangle Urban Renewal Area were rezoned by the Bloomberg administration from industrial to residential. Plaintiffs, a coalition of individuals and community organizations, alleged discrimination and moved under the federal Fair Housing Act both challenging the overall rezoning and also to enjoin defendants from proceeding with development of three specific City-owned parcels under the current residential zoning.

By decision dated December 23, 2011, the Honorable Emily Jane Goodman granted the plaintiff's motion for a preliminary injunction to the extent of enjoining the defendants and their agents from "transferring City owned land and proceeding with the development of 100 Throop Street, 31 Bartlett Street and 35 Bartlett Street..." Broadway Triangle Community Coalition v. Bloomberg, 35 Misc. 3d 167, 168 (N.Y. Co. Dec. 23, 2011).¹ Development is only stayed for the three properties noted above. Prior to the City's taking, Plaintiff Ramoee, Inc. owned the property located at 43 Bartlett Street, Brooklyn, New York.

According to Sheryl Neufeld, the Division Chief of the Law Department's Administrative Law Division, the attorney overseeing the state court litigation, the case is still pending and counsel for the parties have had discussions about the case as recently as April of this year.

Respectfully submitted,



Holly R. Gerstenfeld (HG 3004)
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cc: Goldberg & Rimberg PLLC, 115 Broadway, 3rd Floor, New York, NY 10006

¹ Other decisions related to the state court case can be found in LEXIS at: (1) Broadway Triangle Community Coalition v. Bloomberg, 2010 N.Y. Misc. LEXIS 3032 (N.Y. Co. July 2, 2010); and (2) Broadway Triangle Community Coalition v. Bloomberg, 2010 N.Y. Misc. LEXIS 2321 (N.Y. Co. May 24, 2010).